

# **EXHIBIT P**

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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3 ORACLE USA, INC., a  
Colorado corporation;  
4 ORACLE AMERICA INC., a  
Delaware Corporation; and  
5 ORACLE INTERNATIONAL  
CORPORATION, a California  
Corporation,

7 Plaintiffs, CASE NO.  
vs. 2:10-cv-00106-LRH-PAL

9 RIMINI STREET, INC., a  
Nevada corporation; SETH  
RAVIN, an individual,

10 *Journal of Health Politics, Policy and Law*

13 HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

15 VIDEOTAPED  
16 DEPOSITION OF: Timothy Brian Conley  
17 DATE: September 1, 2011  
18 TIME: 9:03 a.m. to 6:29 p.m.  
19 LOCATION: Westin Hotel  
20 7627 West Courtney  
21 Campbell Causeway  
22 Tampa, FL  
23 TAKEN BY: Plaintiffs  
24 REPORTER: Lori L. Bundy,  
FPR, RPR, CRR, CLR  
25  
26 Redacted  
27  
28

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1	VIDEOGRAPHER: My name is Scott E. Hay of	09:05:15	1	Howard. I represent Oracle.	09:06:18
2	Veritext. The date today is September 1st, 2011. The	09:05:18	2	Would you please state and spell your last name?	09:06:20
3	time is approximately 9:03. This deposition is being	09:05:23	3	A. Timothy Brian Conley, T-I-M-O-T-H-Y, B-R-I-A-N,	09:06:22
4	held at the Westin Hotel located at 7627 West Courtney	09:05:27	4	C-O-N-L-E-Y.	09:06:28
5	Campbell Causeway.	09:05:36	5	Q. Where are you currently employed?	09:06:29
6	The caption of this case is Oracle USA,	09:05:36	6	A. Rimini Street, Incorporated.	09:06:31
7	Incorporated, et al. versus Rimini Street,	09:05:38	7	Q. For how long have you been employed there?	09:06:32
8	Incorporated, et al., in the United States District	09:05:43	8	A. About -- let's see. Almost three years.	09:06:34
9	Court, District of Nevada. The name of the witness is	09:05:45	9	Two years and 10 months, I believe.	09:06:43
10	Tim Conley.	09:05:47	10	Q. When did you start?	09:06:45
11	At this time, the attorneys will identify	09:05:48	11	A. It was the end of October, 2008.	09:06:46
12	themselves and the parties they represent, after which	09:05:50	12	Q. Have you ever worked for Oracle?	09:06:52
13	our court reporter, Lori Bundy, of Veritext, will	09:05:52	13	A. No.	09:06:56
14	swear in the witness and we can proceed.	09:05:55	14	Q. Have you ever worked for PeopleSoft?	09:06:57
15	MR. HOWARD: Geoff Howard with Bingham McCutchen	09:05:57	15	A. No.	09:06:59
16	for Plaintiff Oracle.	09:06:00	16	Q. Have you been worked for TomorrowNow?	09:07:01
17	MR. RECKERS: Rob Reckers, Shook, Hardy & Bacon	09:06:01	17	A. No.	09:07:04
18	for the Defendants, Rimini.	09:06:12	18	Q. Prior to joining Rimini, had you worked for any	09:07:04
19	THEREUPON,	09:06:12	19	third-party support provider that is now owned by Oracle?	09:07:08
20	TIMOTHY BRIAN CONLEY,	09:06:12	20	A. No, sir.	09:07:12
21	a witness, having been first duly sworn, upon his oath,	09:06:12	21	Q. What's your educational background after high	09:07:12
22	testified as follows:	09:06:15	22	school?	09:07:14
23	DIRECT EXAMINATION	09:06:15	23	A. None. High school diploma.	09:07:14
24	BY MR. HOWARD:	09:06:15	24	Q. Have you had technical classes or training in	09:07:17
25	Q. Good morning, Mr. Conley. My name is Geoff	09:06:16	25	software?	09:07:20

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1	A. PeopleSoft technical classes, yes.	09:07:21	1	business analyst and as a user.	09:08:50
2	Q. Could you describe those?	09:07:24	2	Q. And that was from 1998 until when?	09:08:56
3	A. I've had PeopleTools 1 and 2, Application Engine,	09:07:25	3	A. That would have been '99 to 2000.	09:08:58
4	PeopleCode, SQR. I think that summarizes pretty much	09:07:33	4	Q. What was your next job after that involving	09:09:01
5	those.	09:07:39	5	PeopleSoft software?	09:09:04
6	Q. And from whom did you take those classes?	09:07:40	6	A. Right. PriceWaterhouseCoopers from 2000 until	09:09:05
7	A. They were on-the-job training, jobs I was working	09:07:42	7	2003 -- no, 2004.	09:09:11
8	on.	09:07:44	8	Q. And what were your responsibilities there?	09:09:13
9	Q. Who was your employer at the time?	09:07:45	9	A. Software developer.	09:09:15
10	A. One was Crowley Maritime Corporation. The other	09:07:47	10	Q. What kind of software were you developing?	09:09:20
11	was PriceWaterhouseCoopers. I think that's it.	09:07:51	11	A. PeopleSoft.	09:09:22
12	Q. And when you say on-the-job training, were those	09:07:56	12	Q. What were the nature of the projects you were	09:09:22
13	formal classes organized and provided by the employer?	09:07:58	13	working on for PWC?	09:09:25
14	A. For PriceWaterhouseCoopers, yes. Crowley	09:08:01	14	A. Customizations to SQRs, app engines, pages,	09:09:27
15	Maritime was at a PeopleSoft location in Atlanta, training	09:08:08	15	interfaces between payroll and third-party payroll	09:09:37
16	class.	09:08:11	16	vendors.	09:09:42
17	Q. What's your work background dating back to, let's	09:08:11	17	Q. Was this acting as a consultant for existing	09:09:42
18	say, your first job involving any kind of PeopleSoft	09:08:26	18	clients of PWC?	09:09:45
19	software or Oracle software?	09:08:30	19	A. No, it was for their internal firm services.	09:09:47
20	A. My first job was for CSX, the transportation,	09:08:32	20	Q. So PWC's own instance of the PeopleSoft software?	09:09:50
21	railroad, as a payroll analyst; just using it as a user.	09:08:36	21	A. Correct.	09:09:55
22	Q. And when was that?	09:08:42	22	Q. And what applications were you working on?	09:09:55
23	A. It was 1998.	09:08:43	23	A. HRMS payroll benefits and HR.	09:09:58
24	Q. And what was your next job after that?	09:08:45	24	Q. All right. After PWC, where did you go?	09:10:04
25	A. I worked for Crowley Maritime Corporation as a	09:08:47	25	A. I went into consulting, independent.	09:10:08

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Pages 6 to 9

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1	Q. Just set up your own shop? 09:10:12	1	A. No, sir. 09:11:28
2	A. Yeah. 09:10:13	2	Q. So if you were working remotely, how would you 09:11:29
3	Q. And how did you get work? 09:10:14	3	do -- how would you perform your work for Boeing or for 09:11:31
4	A. Monster.com mostly. Put my resumé out. People 09:10:16	4	one of the other -- 09:11:34
5	called me. 09:10:21	5	A. Remote desktop connection. 09:11:35
6	Q. What kind of jobs did you get? What were some 09:10:22	6	Q. You would dial into their machine? 09:11:37
7	examples? 09:10:24	7	A. Correct. 09:11:39
8	A. I worked for Boeing, Florida State University, 09:10:25	8	Q. And so you would be doing development work in 09:11:39
9	Siemens, Royal Bank of Scotland, Extensure (phonetic), 09:10:30	9	some of those projects? 09:11:44
10	Unilever. 09:10:34	10	A. Yes, sir. 09:11:45
11	Q. And in each of those instances, were you also 09:10:35	11	Q. And so you would do your work by dialing in 09:11:46
12	doing development work with PeopleSoft software? 09:10:39	12	remotely -- 09:11:49
13	A. Yes. 09:10:41	13	A. Yes. 09:11:50
14	Q. Let's take Boeing, for example. When you signed 09:10:42	14	Q. -- through a VPM connection? 09:11:50
15	up as a contractor with Boeing through your consultancy, 09:10:51	15	A. Yes. 09:11:52
16	what was the nature of the project? 09:10:56	16	Q. Did you ever download or have objects that you 09:11:53
17	A. It was actually in financials and it was 09:10:57	17	were working on on your local machine as a consultant 09:11:56
18	consolidation of their general book of ledger, so -- 09:11:03	18	working for any of these clients? 09:12:00
19	Q. Would you be working remotely or would you be 09:11:08	19	A. Not to my recollection. 09:12:01
20	working onsite at each of these clients when you were 09:11:11	20	Q. When did you stop working as an independent 09:12:03
21	consulting? 09:11:14	21	consultant? 09:12:14
22	A. It was a mixture. 09:11:15	22	A. When I started working for Rimini Street. 2008. 09:12:15
23	Q. Did you ever have a local version of PeopleSoft 09:11:16	23	Around October 2008. 09:12:19
24	software on your home machine as part of your work as a 09:11:23	24	Q. Have you done any consulting on the side while 09:12:20
25	consultant with any of these companies? 09:11:26	25	you've been working for Rimini Street? 09:12:24

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1	A. No, sir. 09:12:27	1	A. No, sir. 09:13:14
2	Q. Have you ever had your deposition taken before? 09:12:28	2	(A discussion was held off the record.) 09:13:29
3	A. No, I haven't. 09:12:29	3	BY MR. HOWARD: 09:13:31
4	Q. I'm going to go over a couple of the rules. You 09:12:30	4	Q. If you don't understand a question, will you tell 09:13:34
5	may have gone over with them with your attorney, but let 09:12:33	5	me and I'll do my best to rephrase it? 09:13:36
6	me go over just a couple of the ones that I hope we'll 09:12:35	6	A. Yes, sir. 09:13:38
7	follow today. 09:12:37	7	Q. And it's important that we speak one at a time. 09:13:38
8	You understand that the oath you took is an oath 09:12:37	8	Already a couple of times you've started to answer a 09:13:42
9	to tell the truth, the same as if you were in a court of 09:12:41	9	question when I wasn't done. And I'll do my best not to 09:13:45
10	law? 09:12:43	10	step over you. But that way the court reporter can take 09:13:48
11	A. Yes. 09:12:43	11	down a complete question and a complete answer. 09:13:50
12	Q. You understand that the court reporter is going 09:12:43	12	Is that fair? 09:13:53
13	to take down what we say -- my questions and your 09:12:45	13	A. Yes, sir. 09:13:53
14	answers -- and prepare a written transcript? 09:12:47	14	Redacted
15	A. Yes. 09:12:49	15	
16	Q. You understand that you'll have an opportunity to 09:12:50	16	
17	change your testimony when you get that written 09:12:52	17	
18	transcript, but that if you do, me or somebody else at a 09:12:57	18	
19	later proceeding will be able to comment on that? 09:12:59	19	
20	A. Yes. 09:13:02	20	
21	Q. So you understand it's important to give your 09:13:03	21	
22	best testimony to the best of your ability here today? 09:13:05	22	
23	A. Yes. 09:13:07	23	
24	Q. Is there any reason why you can't give your best 09:13:07	24	
25	testimony? Medication or some other reason? 09:13:12	25	

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Pages 10 to 13

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Page 255

1 CERTIFICATE OF OATH

2

3 STATE OF FLORIDA)

4 COUNTY OF COLLIER)

5

6 I, the undersigned authority, certify that  
7 TIMOTHY BRIAN CONLEY personally appeared before me and was  
8 duly sworn.

9

10 WITNESS my hand and official seal this \_\_\_\_\_  
11 day of \_\_\_\_\_, 2011.

12

13

14

Lori L. Bundy

15 Lori L. Bundy

16 Notary Public - State of Florida

17 My Commission No.: DD 713641

18 Expires: September 11, 2011

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Page 256

1 REPORTER'S DEPOSITION CERTIFICATE

2

3 STATE OF FLORIDA)

4 COUNTY OF COLLIER)

5

6 I, Lori L. Bundy, Certified Court Reporter and Notary  
7 Public in and for the State of Florida at Large, certify  
8 that I was authorized to and did stenographically report  
9 the deposition of TIMOTHY BRIAN CONLEY; that a review of  
10 the transcript was not requested and that the transcript  
11 is a true and complete record of my stenographic notes.

12

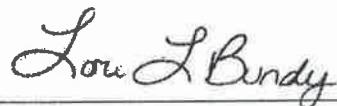
13 I further certify that I am not a relative, employee,  
14 attorney, or counsel of any of the parties; nor am I a  
15 relative or employee of any of the parties' attorney or  
16 counsel connected with the action; nor am I financially  
17 interested in the action.

18

19 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2011.

20

21

  
Lori L. Bundy

22

23 Lori L. Bundy, FPR, RPR, CRR, CLR

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